

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CHRISTINE BENNETT,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:
v)	1:06-CV-723-MHT
)	
ARMY FLEET SUPPORT)	
SERVICES, LLC,)	
)	
Defendant.)	

**UNOPPOSED MOTION TO EXTEND DEADLINE
FOR EXPERT WITNESS REPORTS**

COMES NOW the plaintiff and respectfully moves this Court for the entry of an Order extending by thirty (30) days the deadlines for providing expert reports for all parties in the above-referenced lawsuit. In support of this motion, the plaintiff states the following:

1. This a disability discrimination case where the parties have requested and finally received voluminous medical records from the plaintiff's treating physicians, surgeons and other sources.
2. The parties did not receive the complete medical records until February of 2007, and the plaintiff's counsel was unable to meet with the plaintiff's surgeon in Dothan until March 16, 2007.¹
3. Currently, the plaintiff is required to serve her expert reports on March 21, 2007, and the defendant's expert reports are due on May 1, 2007.

¹The plaintiff had scheduled an earlier meeting with the plaintiff's physician, but the physician had to reschedule that meeting for March 16, 2007.

4. The parties have not delayed the prosecution of this case. The parties have been engaged in active paper discovery, and the plaintiff's deposition is set for March 21, 2007.

5. This requested extension will not impact on any other deadlines set in this case or prejudice any party in this case. Discovery does not cutoff until July 30, 2007, and dispositive motions are due on July 4, 2004.

6. The defendant does not oppose this thirty-day extension of time for the parties to serve expert reports.

WHEREFORE, premises considered, the plaintiff respectfully moves this Court for entry of an Order extending by thirty (30) days the deadlines for each party to serve the reports of retained experts in this matter.

Respectfully submitted,

s/ Ethan R. Dettling
Jon C. Goldfarb
Ethan R. Dettling
Counsel for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been properly filed with the Clerk of Court using the CM/ECF system which will automatically send electronic notification to the following counsel of record:

Kirk Cordell Shaw
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on this the 19th day of March, 2007.

s/ Ethan R. Dettling

OF COUNSEL